

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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K-BEECH, INC., :

Plaintiff, :

**ANONYMOUS NON-  
PARTY UNDISCLOSED  
PRINCIPAL'S  
MOTION TO QUASH  
PLAINTIFF'S SUBPOENA  
DIRECTED  
TO VERIZON INTERNET  
SERVICES LEGAL  
COMPLIANCE  
FOR LACK OF SUBJECT  
MATTER JURISDICTION  
IN THE COURT**

**ECF CASE**

-vs- :

JOHN DOES 1-21, :

Civil Action No.

11-CV-04777-GBD

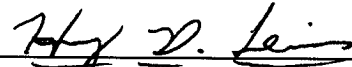
Defendants. :

\_\_\_\_\_ X

By and through undersigned counsel, Anonymous Non-Party Undisclosed Principal, a son of John Doe 19, moves the Court to quash the subpoena issued out of the U.S. District Court for the Northern District of Texas in the above-styled case addressed to Verizon Internet Services, Legal Compliance, P.O. Box 1001, San Antonio, TX 76902 demanding the name, address and telephone number of defendant John Doe 19 for lack of subject matter jurisdiction in the court. A true and exact copy of the subpoena without the attached Notice provided by Verizon is annexed hereto as Exhibit A.

DATED: October 24, 2011

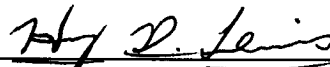
Respectfully submitted,



Harry D. Lewis, Esq., HL-8975  
Attorney for Anonymous Non-Party  
Undisclosed Principal  
275 Madison Avenue, Suite 1400  
New York, N.Y. 10016  
Phone: (212)-813-8393  
Fax: (718)-874-4421  
e-mail: hlewis888 at optimum.net

**UNSWORN DECLARATION OF SERVICE**

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that I served a copy of this motion together with the annexed Unsworn Declaration of Harry D. Lewis and Memorandum of Law in Support of Motion to Quash, both dated October 24, 2011, upon Verizon Internet Services, Legal Compliance, P.O. Box 1001, San Angelo, TX 76902 and upon Evan J. White, Esq., c/o DiSanto LLP, 15 Maiden Lane, Suite 1208, New York, N.Y. 10038 on this 24<sup>th</sup> day of October, 2011 via Express U.S. Mail, overnight delivery requested.



Harry D. Lewis

# **EXHIBIT A**

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

**UNITED STATES DISTRICT COURT**  
for the Northern District of Texas

K-Beech, Inc.,  <p align="center"><i>Plaintiff</i></p> <p align="center">v.</p> John Does 1 - 21,  <p align="center"><i>Defendants.</i></p>	Civil Action No. <b>11-CV-4777</b>  UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK
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**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Verizon Internet Services  
Legal Compliance  
P.O. Box 1001  
San Angelo, TX 76902  
Via Facsimile: (325) 949-6916

*Production*: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

Please produce documents identifying the name, address, and telephone number of the defendant John Does listed in the below chart:

Doer#	IP Address	Date/Time UTC
19	71.183.92.178	4/22/2011 4:58
20	72.89.118.139	4/14/2011 6:43
21	74.101.97.121	5/23/2011 11:51

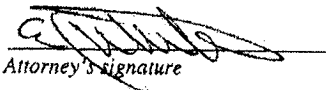
Place: Evan J. White, Esq. DiSanto LLP 15 Maiden Lane, Suite 1208 New York, NY 10038	Date and Time: September 30, 2011 @ 9:30 a.m.
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*Inspection of Premises*: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 5/6/11  
 \_\_\_\_\_  
 CLERK OF COURT

\_\_\_\_\_  
 Signature of Clerk or Deputy Clerk      OR        
 Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing Plaintiff, who issues or requests this subpoena, are:  
 Evan J. White, Esq., DiSanto LLP, 15 Maiden Lane, New York, NY 10038,  
 Telephone: (212) 766-2468, Email: [ewhite@evanwhitelaw.com](mailto:ewhite@evanwhitelaw.com)